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September 6, 2018

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Promoting Investment in the 3550MHz-3700MHz band (GN Docket No. 17-258)

Dear Ms. Dortch,

Contour Networks Inc. (CNI) welcomes the opportunity to provide comment on GN Docket No. 17-258. CNI is a subsidiary of Japan Communications Inc. (JCI), Japan's leading MVNO and global pioneer of the MVNO business model. JCI, founded by Dr. Frank Seiji Sanda in 1996, is publicly traded on the first section of the Tokyo Stock Exchange and is the world's first service provider to be interconnected to two of the three Japanese mobile carriers in NTT docomo Inc. and Softbank Corp. In addition to Colorado-based CNI, JCI Group companies operate in Florida and Ireland. In addition to consumer services, the JCI Group provides enterprise and IoT customers a secure end-to-end network globally via its patented secure wireless leased line technology.

CNI strongly supports the Commission's efforts to promote investment into the Citizen's Broadband Radio Service (CBRS) band. In deregulating the usage of this spectrum, the United

States will be taking bold global leadership in telecommunications and spectrum allocation policy. By allowing American ingenuity and creativity a fair hand in the delivery of wireless telecommunication services, CBRS will drive innovation, competition and lead to the creation of entirely new industries.

The opening of spectrum access for LTE services is an issue that regulators across the globe are considering. In the EU, for example, the European Telecommunications Standards Institute has issued proposed specifications for License Shared Access. Together with other mechanisms, this is being reviewed at the national level but there remains no unified plan or approach in place at this time. Japan, on the other hand, has already approved and deregulated spectrum for license-exempt access under its TDD-LTE sXGP program. While still nascent, there is already significant private sector interest and uptake. However, under sXGP only 12MHz has been deregulated at this time. 12MHz is insufficient for the delivery of impactful services that bring real value to public or private initiatives. In its rollout of 150MHz of spectrum in CBRS, the US is showing true global leadership in spectrum policy. Far from this being a case of the US going-it-alone, we firmly believe that following the implementation of CBRS, regulatory bodies globally will quickly follow suit with similar programs of their own as they pursue the waves of innovation and economic growth generated by US policies

Currently, much focus around the world is on the delivery of 5G networks and services. In addition to its other benefits, 5G is now touted as the technology that will truly enable the Internet of Things (IoT). This is incorrect. CBRS, and other deregulated spectrum access models, will be the true catalyst for IoT adoption. Traditional mobile carriers simply do not have the capabilities to cater to corporate customer requirements for IoT services. Mobile carriers can inadvertently impede new services due to profitability or scale concerns that IoT firms looking at the entire solution will not share. Ultimately, the delivery of IoT will require the development of new mobile service distribution models similar to System Integrators in the computer industry. Furthermore, in IoT the corporations that will require telecommunications service will no longer operate at a domestic level only. Global end-to-end networks are required. CBRS will ensure the US takes the lead in the development and rollout of IoT services globally. As other countries follow the US lead, license-exempt spectrum access will encourage new industries to spawn to meet multinational corporations' requirements for IoT.

CNI applauds the FCC for the bold leadership it has shown in developing the CBRS policy. CNI urges the FCC to push ahead with CBRS in its current format and asks that any changes be considered from the perspective of allowing as many players as possible to participate in the delivery of wireless telecommunications services. By allowing market forces to control wireless telecommunications service delivery, CBRS will drive innovation and lead to the creation of services that we cannot even imagine today.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Colm P. Sharkey', with a stylized, flowing script.

Colm P. Sharkey

Senior Vice President, Operations

Contour Networks Inc.

Fully endorsed by:

Frank Seiji Sanda Eng. D,

Founder, Chairman, and Chief Executive

Japan Communications Inc.